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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WEALTHY INC., and DALE BUCZKOWSKI,

Plaintiffs,

v.

SPENCER CORNELIA, CORNELIA MEDIA
LLC, and CORNELIA EDUCATION LLC,

Defendants.

Case No. 2:21-cv-01173-JCM-EJY

**STIPULATION TO EXTEND TIME TO
RESPOND TO PLAINTIFFS' PARTIAL
MOTION FOR SUMMARY JUDGMENT
[ECF NO. 60] AND DEFENDANTS'
SPECIAL MOTION TO DISMISS
PURSUANT TO NRS 41.660 AND
MOTION FOR SUMMARY JUDGMENT
[ECF NOS. 61 & 62]**

(SECOND REQUEST)¹

Plaintiffs Wealthy Inc. and Dale Buczkowski ("Plaintiffs") and Defendants Spencer Cornelia, Cornelia Media LLC, and Cornelia Education LLC ("Defendants") (collectively, the "Parties") hereby submit the following stipulation and order to extend the time for Defendants to respond to Plaintiffs' Partial Motion for Summary Judgment (ECF No. 60) and Plaintiffs to respond to Defendants' Special Motion to Dismiss Pursuant to NRS 41.660 and Motion for

¹ The parties filed a stipulation to extend Plaintiffs' time to respond to Defendants' Special Motion to Dismiss Pursuant to NRS 41.660 and Motion for Summary Judgment on October 14, 2022 (ECF No. 65). This is the parties' first request to extend time for Defendants to respond to Plaintiffs' Partial Motion for Summary Judgment.

Summary Judgment (ECF Nos. 61 & 62) pursuant to LR IA 6-1. The Parties request an additional 7 days to file these responses.

1. On August 29, 2022, Defendants filed their Motion for Extension of Discovery (ECF No. 44).

2. On August 30, 2022, Defendants filed their Motion to Compel a continued deposition of Plaintiff Dale Buczkowski (ECF No. 45).

3. Plaintiffs filed their Motion for Partial Summary Judgment on September 30, 2022.

4. Defendants filed their Special Motion to Dismiss Pursuant to NRS 41.660 and Motion for Summary Judgment on September 30, 2022.

5. By prior stipulation of the Parties, responses to these cross-motions for summary judgment are due by October 21, 2022.

6. On October 4, 2022, the Court entered an order granting in part Defendants' motions to extend discovery and to compel (ECF No. 63). In this Order, the Court extended discovery to October 31, 2022 and continued the dispositive motion deadline to November 30, 2022.

7. On October 13, 2022, Defendants filed their Motion to Compel Reasonable Deposition Dates (ECF No. 64).

8. On October 14, 2022, the Court entered a Minute Order setting a hearing on the Motion to Compel Reasonable Deposition Dates for October 24, 2022 at 11:00 a.m.

9. On October 18, 2022, Defendants filed their Motion for Leave to Conduct Additional Discovery Pursuant to Fed. R. Civ. P. 56(d) (ECF No. 69).

10. Because there are pending motions, the outcome of which may affect what discovery is taken in this case and what information is available to the parties in responding to

one another's dispositive motions, there is good cause for the current briefing schedule on these motions to be extended.

11. The Parties stipulate that the current deadlines to respond to the pending dispositive motions (ECF Nos. 60, 61, and 62) shall be extended by 7 days, to October 28, 2022.

IT IS SO STIPULATED.

Dated: October 21, 2022.

Respectfully Submitted,

/s/ Tamara Beatty Peterson

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/s/ Alex J. Shepard

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Wealthy Inc. and Dale Buczkowski

IT IS SO ORDERED.



U.S. DISTRICT COURT JUDGE

Dated: October 24, 2022

Case No. 2:21-cv-01173-JCM-EJY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 21, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document being served via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Alex J. Shepard
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